

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Office of the Director of National Intelligence

Follow-up to OGE Report Number: 23-52I

Report No.: 25-25IF

Date: December 12, 2024

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

During its inspection the Office of Director of National Intelligence (ODNI) ethics program was temporarily unable to provide the Office of Government Ethics (OGE) with access documentation necessary to assess portions of ODNI's ethics program.

OGE conducted a follow-up review to assess: (1) the filing timeliness of non-PAS new entrant reports; (2) the review and certification timeliness of PAS and non-PAS reports; and (3) the filing, review and certification of confidential reports. The results of the follow-up review are summarized below.

PUBLIC FINANCIAL DISCLOSURE

DATA ANALYSIS	%
Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	100%
Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%
Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	89%
Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	83%
Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	67%

CONFIDENTIAL FINANCIAL DISCLOSURE

DATA ANALYSIS	%
Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	100%
Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%
Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%
Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	100%

OGE's review of ODNI's public financial disclosure system found that the sampled non-PAS public reports were all filed and reviewed timely. Reports were generally reviewed and certified in a timely manner. Certifications for two of the six PAS reports were late. However, both certifications were less than six days late.

OGE's review of ODNI's confidential financial disclosure system found that all sampled confidential reports were filed, reviewed and certified timely.

Based on the results of its follow-up review, OGE does not have any recommendations for ODNI's public and confidential financial disclosure systems.